ENTACT
environmental tactics in waste management

May 30, 1997
VIA FACSIMILE
Mr. Thomas Alcamo
U.S. EPA - RegionV
77 W. Jackson Boulevard, SR-6J
Chicago, Illinois 60604-3590

RE: Master Metals Site - Phase I Time-Critical Removal Action Workplan

Dear Mr. Alcamo:

Please find ENTACT's response to May 23, 1997 comments received from the U.S. EPA and the Ohio EPA. As previously discussed, mobilization for the Phase I removal activities is anticipated to begin on June 9. 1997. Please contact me at (630) 616-2100 should you have any questions or require additional information.

Respectfully,

Dean Pisani
ENTACT, Inc.

Attachment

cc: Bart Ray, OEPA-NEDO
Kris Vezner, U.S. EPA, CS-29A
Master Metals Technical Committee
file

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The following responses are provided for the U.S. EPA and OEPA comments on the Phase I Time-Critical Removal Action Workplan received on May 23, 1997. This document is incorporated as Addendum #1 to the Workplan.

Phase I Time-Critical Removal Action Work Plan

1. Comment (Page 4, Section 2.5, Last Paragraph):
Since all activities will take place on-site, no permits will be required, but ENTACT will have to meet the substantive requirements. Notification requirements for demolition activities with asbestos containing material may be required after a determination is made if asbestos is present.

Response:
ENTACT will conduct demolition activities in accordance with applicable Ohio and City of Cleveland/Cuyahoga County regulations and codes (i.e., permit applications/fees, ACM surveys, etc.)

2. Comment (Page 5, Section 2.7, Column 2, Paragraph 2):
What is the turnaround time for the analysis on the PM10 monitors?

Response:
PM10 results will be available approximately 6 hours following receipt of the samples by the laboratory. PM10 filters will be shipped via overnight courier to the laboratory for analysis on the day of the sampling. Therefore, the turnaround time for the analysis of the PM10 filters is 24 hours.

3. Comment (Page 7, Section 3.4 and Figure 3.1):
The excavation area is adequate but please be aware that additional sampling may take place during the Engineering Evaluation/Cost Analysis to determine the nature and extent of contamination.

Response:
ENTACT understands that additional sampling may be necessary to determine the nature and extent of contamination for the EE/CA. Use of XRF field screening and verification sampling will be used in conjunction with the existing site data to complete a preliminary evaluation of nature and extent.

4. Comment (Page 8, Section 3.5.1, Number 7):
You are proposing at least 20% verification samples for each grid to confirm your XRF data. Only a small portion of these samples are being analyzed for arsenic and cadmium. It may be appropriate to sample for other metals in all of the verification samples since lead is not the only contaminant of concern. Subsequently, these verification samples can be used for development

of the EE/CA. If you choose not to analyze for other metals at this time, metals sampling will be completed within the EE/CA, since metals other than lead are contaminants of concern.

Response:
ENTACT understands the point and the analysis of arsenic and cadmium, in addition to lead, was to supplement the existing site data. Based on previous site data (i.e., E & E, Inc. (8/92) and CTI (1/91)), only 5 of the 8 RCRA metals were detected out of approximately 54 samples. The metals (totals) included arsenic, barium, cadmium, chromium and lead. However, arsenic, cadmium and lead were the only metals detected above the TCLP regulatory limits, hence the rationale for selection of the analytes noted. In addition to the 5 RCRA metals detected, nickel was also detected in samples collected from the site. In keeping with ENTACT's approach to supplement existing site data for the EE/CA, laboratory analysis of verification samples will include the addition of nickel, barium and chromium.

With the aforementioned incorporated, item number 7 under Section 3.5.1 on page 8 should read as follows:

7. A verification grab sample will then be obtained from each grid that does not exhibit the presence of fill materials (i.e., slag, cinders, etc.) at a frequency of not less than 20% of the total number of grids. Verification samples will be submitted to the laboratory for analysis to confirm XRF data. In addition, the verification grab samples will also be laboratory analyzed for total arsenic, barium, cadmium, chromium and nickel.

5. Comment (Page 10, Section 3.6, Column 1, Paragraph 1):
Once you have developed the correlation between XRF total lead and TCLP lead, please submit to the U.S. EPA details in how this correlation was developed.

Response:
ENTACT will submit the details to the RPM once the correlation has been developed.

6. Comment (Page 16, Section 4.0):
All disposal facilities must be identified prior to any shipment of waste material pursuant to the CERCLA off-site policy. The disposal facility must be in compliance with all regulations prior to receiving waste materials from a CERCLA site.

Response:
ENTACT will disclose all disposal facilities to be utilized prior to shipment of any waste materials. It is ENTACT's understanding that scrap metal is not a solid waste, but is considered a recyclable.

7. Comment (Page 16, Section 4.2):
Prior to full scale startup of the stabilization process, the U.S.EPA would like to se the results of the treatability study. The additive blend does not have to be submitted but final analytical results are critical in determining an off-site disposal location.

Response:
ENTACT will submit the results of the treatability study to the U.S. EPA prior to initiating stabilization operations.

8. Comment (Page 17, Section 4.3, Baghouse Facility):
Any waste associated with emission control dust/sludge from secondary lead smelters is classified as K069. Treatment standards exist for K069 and pursuant to 40 CFR 268.42, thermal recovery of lead in secondary smelters is the required treatment standard for K069. Therefore, the baghouse facility and the associated material within the duct work must be treated as K069. Baghouses are also present within the furnace room and also will require treatment as K069 if they were used as an emission control device.

Response:
ENTACT understands that emission control dust/sludges from secondary lead smelting contained within the ductwork of the baghouse will be classified as K069. In addition, ENTACT will determine if the baghouses in the furnace room were utilized as emission control equipment for evaluating waste designation and disposal/treatment options.

Health and Safety Plan

1. Comment:
The City of Cleveland Fire Department would like to walk through the site after mobilization to become familiar to the risks associated with this removal action. If an unforeseen accident occurs and the Fire Department is required, then they will be familiar with the site risks. I will be in contact with ENTACT and the responsible parties to set up the walk through.

Response:
ENTACT will coordinate with the U.S. EPA to arrange a site walk through following mobilization to familiarize concerned parties with the risks associated with this removal action.